PBW

Consulting Engineers
and Scientists

PASTOR, BEHLING & WHEELER, LLC
2000 S. Mays, Suite 300
Round Rock, TX 78664

Tel (512) 671-3434
Fax (512) 671-3446

MEETING MINUTES

MEETING: ***Gulfco Superfund Site – EPA Scoping Phase Meeting***

LOCATION: EPA Region 6 - Dallas, TX

DATE: August 4, 2005

ATTENDEES: Mr. Gary Miller, EPA Project Manager
Ms. Anna Treinies, EPA Toxicologist (Human Health)
Ms. Susan Roddy, EPA Toxicologist (Ecological)
Ms. June Hoey, EPA Community Relations
Mr. Eric Pastor, PBW, LLC
Dr. Kirby Tyndall, PBW, LLC
Mr. Eric Matzner, PBW, LLC
Dr. Bill Quast, Benchmark Ecological Services, Inc. (BESI) – via conference call

DOCUMENT EXCHANGE:

Documents PBW Provided to the EPA:

1. July 2005 Monthly Status Report, dated August 3, 2005
2. Draft RI/FS Flow Chart (large figure)
3. Draft RI Process Figure
4. Draft Data Needs Table
5. Conceptual Site Model Figure

Documents EPA Provided to PBW:

1. June 2005 Gulfco Superfund Site Fact Sheet
2. Gulfco Superfund Site Administrative Record (on two CD's created July 28, 2005)
3. Community Involvement Plan (dated August 2005)
4. TCEQ Special Investigation – Criminal Investigation Interview of Mr. Mickey Wayne Tiner, dated August 6, 1997

EPA (G. Miller) stated the objectives for the meeting and RI/FS:

1. Establish the type of investigation that needs to be conducted to define the nature and extent and to collect data to prepare the risk assessment;
2. Conduct a quick and efficient clean-up process;
3. Review the timelines for the investigation;
4. Discuss the Screening Level Ecological Risk Assessment (SLERA);
5. Discuss the step-wise approach to the investigation in the RI/FS Work Plan, have contingencies built in the Work Plan for further lateral delineation;
6. Marilyn Long is the current TCEQ Project Manager, but the TCEQ is currently going through a reorganization and a new TCEQ PM is anticipated; and

7. EPA emphasized that the community is very involved and interested in this project; Mr. Miller said that he has received many calls regarding this site from the public.

Community Relations

- EPA will conduct the community relations with Ms. June Hoey as the lead contact.
- EPA will prepare the Superfund Fact Sheets and will send out advance copies to the Respondents; however, the copies will not be sent out to the Respondents as draft, just courtesy copies before release to the public. Respondents may provide comments that the EPA will consider.
- Ms. Hoey is considering two locations in the Freeport area for holding community meetings.
- E. Pastor mentioned Jan Huisman of Dow Chemical as a good contact for locating meeting centers in the Freeport area; Ms. Hoey requested that E. Pastor email her the contact information for Jan.
- The Document Repository is the Freeport Public Library.
- EPA has prepared a Community Relations Plan, a copy will be placed in the document repository. This will be considered a living document through out the Superfund process.
- EPA will provide the documents to the repository, not only documents produced by the Respondents but also documents produced by other agencies. EPA will provide Respondents with a copy of all documents placed in the repository.
- EPA will add the Respondents to the mailing list for Fact Sheets and assure documents from other agencies are disseminated to the Respondents' Project Manager.
- The latest Fact Sheet is dated June 2005; the next scheduled Fact Sheet is scheduled to be released following the Scoping Meeting, possibly released in early September.
- Mr. Miller is the initial point of contact for the EPA regarding community relation issues.

Project Scheduling

Discussed the first two groupings for submittal deadlines (if a deadline falls on a Saturday or Sunday, the deadline is the following Monday):

First Grouping

- Notice of Intent to Comply (NIC) (UAO Paragraph No. 41) – due 14 days after effective date ***[August 12, 2005]***.
- Establishing the Project Coordinator (UAO Paragraph No. 65) – due 14 days after effective date ***[August 12, 2005]***.
- Scoping Meeting (SOW Paragraph No. 16) – due 15 days after effective date ***[August 15, 2005]***.
- Monthly Progress Reports (UAO Paragraph No. 53)
    - These are due to the EPA by the 15th of each month (reporting on the previous month's activities). Mr. Miller said he does not need to receive a hard copy as long as he receives a signed electronic copy (PDF is sufficient).
- Health & Safety Plan (SOW Paragraph No. 29) – due 20 days after the effective date ***[August 18, 2005]***, EPA does not approve the HASP.

Second Grouping

- List of contractors, subcontractor, consultants and qualifications (UAO Paragraph No. 42) – due 30 days after effective date ***[August 29, 2005]***.
    - EPA wants list of names, titles, relevant experience for subcontractor firms;
    - Quality Management Plan required for main contractor (subcontractors covered under this plan); and
    - Qualifications for key individuals working on the project (key contractor personnel).

- Access Agreements (UAO Paragraph No. 72) – due 30 days after the effective date ***[August 29, 2005].*** Mr. Miller requested that access agreements be attained for the property north and northeast of the Site (relative to Site property north of Marlin Ave). The EPA expects the Respondents to comply with the deadline date for the access agreements. However, if locating the current owner(s) requires additional time, the EPA will consider a written extension request, provided a good faith attempt is conducted to acquire the access agreements. In the event other properties need to be investigated as part of the step-wise investigation, those off-site agreements will be required 30 days after it is known that access to additional properties is required.
- Screening-Level Ecological Risk Assessment (SLERA) – due 30 days after the effective date ***[August 29, 2005]***; and the Final SLERA due 15 days after receiving EPA comments.
- RI/FS Work Plan and SAP (SOW Paragraph Nos. 17 and 25) – due 60 days after the effective date ***[September 27, 2005].***

Review Site History using Aerial Photographs

Reviewed the Site operations and history based on the historical aerial photographs and the discussion with Mr. Billy Losack during a Site visit on July 20, 2005. Mr. Miller requested a copy of the large aerial photographs (years 1965, 1977, 1985, 1987, 1996, and 2004). Mr. Miller asked if there were any documents detailing if the dredge material from the Intracoastal Waterway was used to create upland areas of the Site. E. Pastor indicated that he was not aware of such documentation.

Conceptual Site Model

- Mr. Miller did not feel a detailed discussion of the CSM was needed since it had been reviewed and generally agreed to during previous discussions.
- The CSM figure will be included in the RI/FS Work Plan.

Remedial Investigation Objectives

- Mr. Miller discussed the "outstanding issues" for the Site investigation, specifically where there had previously been disagreement between the EPA and the Respondents.
- Mr. Miller wants to see a step-wise approach to the investigation focusing on two key areas: 1) human health, and 2) ecological.
- E. Pastor presented a draft RI Flow Chart to discuss the step-wise approach for the investigation.
- Mr. Miller agreed with focusing biased samples in Potential Source Areas (PSAs), but wants to see gridded sampling (both random and biased) across the Site. Random samples will be collected from each grid.
- Mr. Miller is favorable to the Triad Approach; make sure to incorporate contingencies and options into the RI/FS Work Plan.
- E. Pastor presented the terminology of chemicals of interest (COI) as a function of the RI, chemicals of potential concern (COPCs) during the initial screening, and chemicals of concern (COCs) from the risk assessments.
- Ms. Roddy wanted to make sure the COI list included the full analytical suite; in addition, she would like to see the chromium analysis speciated.

Soils

Mr. Miller emphasized that he wants to see gridded sampling with random sampling within each grid. E. Pastor discussed the general sampling plan for each specific PSA:

- *AST Tank Farm Area*
    - Mr. Miller wants to see several samples collected from under the current AST Tank Area and sump area.

  - Samples will also be collected from a grid along the boundary of the AST Tank Area, biased samples where water was noted as seeping from containment area.
  - COIs will include the full analytical suite.
- *Pipelines*
  - Use geophysical field methods to locate pipelines (to former impoundments and former wash water tanks);
  - Mr. Miller is agreeable with focused/biased sampling along the pipelines.
  - COIs will include the full analytical suite.
- *Former Impoundment Area*
  - Laid out general locations for grid sampling around former impoundments and former ASTs (1985 aerial);
  - Mr. Miller said no sampling will be required in the near term under the former impoundments; no drilling through the cap, residual waste, and underlying material.
  - COI will include the full analytical suite.
- *Former Wash Water Storage Tank Area*
  - Laid out grid around former tank area and will place biased sample locations within the footprints of the former tanks (centerline of tank footprint);
  - COI will include the full analytical suite.
- *Former Electrical Shed*
  - Place grid locations around shed, tighter than 100-ft grid.
  - COI will consist of PCBs only, EPA agreed; Ms. Roddy would like to see PCBs analyzed for individual congeners (~10% of samples), since Aroclors have weathering issues.
- *Sand Blasting Areas*
  - Two sand blasting areas identified (on 1996 aerial), will grid area and place random samples within the grid.
  - EPA also recommends collecting soil samples of the top 1 inch within the sand blasting area and along the west property line, along the former dust screen (see Lot 21 discussion below).
  - For general sampling (i.e., not top 1-inch samples), COI will include full analytical suite per request of Ms. Treinies.
- *Welding Areas*
  - Sample grid placed around each of the concrete areas, may look at a 100-ft grid near these areas.
  - COI will include metals and VOCs only.
- *Dry Dock Area*
  - Samples will be collected from the slopes and some distance from the dry dock ramp.
  - COI will include full analytical suite.
- *Surface Drainage Routes*
  - Samples will be collected along drainage points, gullies as will be generally referenced in the RI/FS Work Plan.
  - COI will include full analytical suite.
- *Lot 21 Area (the "tooth" shaped area)*
  - This includes the Dry Dock, Barge Slip No. 1, and Sand Blasting Area. Also, grid sampling along former dust screen on the western perimeter of the Site.
  - Soil samples will be collected on a 100-ft grid both with random and biased locations.

- Mr. Miller wants to see soil samples collected from the top 1 inch of soil in a random grid pattern. These samples will be collected in addition to the grid sampling previously discussed for the Dry Dock and Sand Blasting PSAs.
- COI for the 1-inch samples will be metals only, which will be screened against residential screening values. If no exceedences are noted surface soil sampling of the adjacent property to the west for metals would not be required.

- *Random Sampling*
  On-Site Sampling
  Mr. Miller wants to investigate potential areas on Site where he believes waste could have been buried. Specifically, vacant Lots 57 and 58 (west of the former impoundment area).
  - A majority of Lots 57 and 58 are considered wetlands; therefore, Mr. Miller wants grid sampling on 200-ft grid.
  - These areas will be sampled for sediments instead of soils and only one sample will be collected per location.

  Mr. Miller still wants to apply grid sampling across the entire Site on 200-ft grid with random samples. The areas that are tidally influenced would be sampled as sediment, other areas as soil.

  Off-Site Sampling
  In the context of discussing the Lot 21, Mr. Miller said off-site sampling to the west will not be necessary during the initial investigation. If the soil results from samples collected along the west property line (former screen area) exceed the residential screening values, off-site delineation will be necessary to the west of the Site.

<u>Sediment Sampling</u>
- Mr. Miller will not require sediment sampling from the residential canals, unless the step-wise process indicates such sampling is needed to define the lateral extent of contamination.
- Mr. Miller wants to see sediment samples collected from the wetland areas and the Intracoastal Waterway adjacent to the Site.
- Ms. Roddy would like a copy of the 1996 Aerial with GPS locations noted by Barry Forsythe plotted on the figure.
- COI for the sediments will consist of the full analytical suite.
- Mr. Miller wants grain size and organic carbon analysis from the sediment samples.
- Mr. Miller wants five sediment samples collected from the large fresh water pond and three samples collected in the small pond (both north of Marlin Ave.).
- Mr. Miller wants 15 sediment samples collected from the wetland area on north and northeast sides of site (off-site) and a 200-ft grid of random sampling on-site; use the wetland map to select off-site locations.

<u>Fish Tissue Sampling – Human Health</u>
Mr. Miller requests fish tissue samples to be collected from species that are found in the area and that are commonly consumed by residents in the area. Mr. Miller listed off the following fish to be considered (other similar species will be fine as well):

1. Flounder
2. Red Drum
3. Speckled Trout
4. Black Drum
5. Blue Crab

- Mr. Miller wants to see three samples collected from three of the fish listed in addition to three samples from Blue Crabs (a total of nine fish samples and three crab samples).
- Mr. Miller asked about the habitat range for these fish (listed above). Dr. Quast discussed the lack of habitat along the Site shoreline, and that most of the fish species listed would likely just pass by the Site. He discussed that the fish prefer good habitats with good food sources, and he did not note such food sources present during the Site visit in July 2005. Juvenile Blue Crabs could spend a relatively longer time at the Site, but would likely migrate out to other food sources once they reach consumable size (adult size). Dr. Quast's conclusion on the potential for habitat at the Site along the Intracoastal Waterway was that this area does not hold much food source to keep seafood in this area.
- EPA is only interested in fish in the Intracoastal Waterway; additional investigation towards Oyster Creek may be necessary later if data show contamination migration from the Site into Oyster Creek.
- Mr. Miller indicated that the COI for fish tissue would be determined based on the sediment results (i.e., if an analyte is detected in the sediment, that analyte would be analyzed in fish tissue). Metals present a problem in respect to background.
- EPA will review their policies and guidance regarding background concentrations for metals in respect to the fish tissue sampling.
- EPA will also evaluate the essential metals (i.e., calcium, potassium, etc.) that should be removed from the sampling program. The EPA will provide a list of metals that it would like to have evaluated.
- E. Pastor suggested that it might be more appropriate to base the COI list for a fish tissue sampling program on the list of bioaccumulative constituents detected above background in the sediment samples. EPA did not commit to eliminating analytes that are not bioaccumlative, but will review the essential metals.
- EPA will require fish tissue sampling, but will allow the step-wise process of collecting sediment samples, and analyzing the fish tissue samples based on the sediment sampling results.
- EPA indicated that background fish tissue sampling or reference sampling may be an option to evaluate site-related gradients in the Intracoastal Waterway.
- Dr. Quast discussed previous fish tissue evaluations of juvenile versus adult fish. Juvenile fish tend to travel less. Mr. Miller will discuss this topic with Barry Forsythe over the next week. Ms. Roddy mentioned the general public would not be interested in the juveniles since those are not typically eaten.

<u>Ecological Issues</u>

- For Site samples collected south of Marlin Ave. (considered commercial/industrial property), EPA will not require screening against ecological criteria.
- EPA agreed with the ecological steps in the RI/FS Flow Chart provided by PBW.

<u>Surface Water</u>

- Mr. Miller wants 15 surface water samples collected from the wetlands north and northeast of the Site, on and off Site.
- Collect three surface water samples each from the fresh water ponds.
- COI will consist of the full analytical suite, and in addition, analyze for hardness, pH, and total (unfiltered) and dissolved (filtered) metals.
- EPA requested that the surface water result be compared to Texas Ambient Water Quality Standards (TWQSs); however, ESSLs will supersede the TWQSs.

Groundwater

- PBW proposed installing both temporary well points and permanent wells near and around PSA's (Sand Blasting Areas, Former Wash Water Storage Area, Septic Tank Areas, AST Tank Farm, Dry Dock Area, Former Impoundment Area and associated AST area, and a perimeter well network). EPA was agreeable with this approach.
- Mr. Miller indicated that groundwater samples will need to be collected west of former impoundment area. Mr. Miller will check on required permits (Mr. Wes McQuitty) to put wells in wetland areas (disturbing wetlands from the well construction).
- EPA agreed with groundwater sampling from about 20 locations (temporary well points as well as permanent wells) based on the discussion of the PSAs.
- COI for groundwater will consist of the full analytical suite.
- EPA wants to ensure analytical method will produce sample quantitation limits/reporting limits low enough to compare to the screening tables. EPA stated that any analytes with high reporting limits will need to be carried through the risk process.
- Groundwater analytical results will be compared to ecological surface water criteria.
- Mr. Miller wants the lithology evaluated at depth, identify the water-bearing sands down to drinking water zone.

Indoor Air

- Mr. Miller mentioned that indoor air may need to be evaluated if groundwater is impacted and migrated off Site.

Action Items

1. PBW – Provide figure with Barry Forsythe's grid locations to Ms. Roddy.
2. EPA – Decide on fish tissue COI list that they would like to see used.
3. EPA – Decide on fish tissue sizes they would like to see sampled (juvenile vs. consumable size).
4. EPA – Check on requirements for working in wetland areas.
5. PBW – Provide large scale aerial photos to Mr. Miller.
6. PBW – Provide Scoping Phase Meeting minutes
7. PBW – Provide Jan Huisman's (Dow) contact information to June Hoey.